

Telecompute Corporation

A Telecommunications Service Company

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1275 K Street, N.W., Suite G-9
Washington, D.C. 20005
(202) 789-1111

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Office of the Secretary
Federal Communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

October 20, 1995

Comments filed in the matter of)
Toll Free Service Access Codes) CCDocket No. 95-155 DOCKET FILE COPY ORIGINAL

Sir:

Our firm, a small telecommunications service business, deals with carriers and end users of toll free numbers on a daily basis. Our comments are based upon the experience acquired in dealing with these matters during the last ten years, and are arranged as responses to the section(s) of your notice identified below:

Page 12, Item 14

Escrow deposits for reserving toll free numbers do nothing to solve the problem, just raise the ante for potential 'hoarders'. The escrow deposit plan would unfairly raise the cost of doing business for small businesses. Significantly reducing the allowable reserves puts pressure on all concerned to order only those numbers which they intend to install.

Page 12, Item 15

The savings brought about through the use of PINS (less toll free numbers required for a specific business purpose and therefore less in installation fees) should be its own financial reward for pursuing this technology.

Page 12, Item 15

Although a 1% reserve threshold may be too low, the current policy of 15% is in gross excess. Its time to stop treating toll free numbers like a stockpile of raw materials awaiting assembly into finished goods at the start of the industrial revolution. If there are delays in 'moving data' from RESPOGS to SMS and back, work on that part of the problem by establishing minimum data handling capabilities by RESPOGS. It is a far more equitable public policy to place financial burdens on large businesses who want to participate as carriers than to impose additional fees, deposits, or delays upon small businesses.

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Page 12, Item 16

If you reduce the allowable reserves, you automatically reduce the potential for 'hoarding'. The monthly fees associated with installed numbers assist in preventing hoarding.

Page 15, Item 18

Reducing the **reserve** period and the **installed but not working** period are necessary and should have occurred 2 years ago.

Page 15, Item 19

Reducing the 'aging' time helps increase the pool of available numbers. However, a new subscriber should get a 'hit report' of attempts on the number during the previous 90 days before making such a decision to accept the number. As a matter of policy, our company 'quarantines' new toll free numbers at turnup, limiting their connect time for a 90 day period before assigning them to customers. This helps prevent getting unwanted calls and haggling over payment for unwanted 'surprise' calls.

Page 19, Item 27

'Triggers' should be related to rate of use not quantity (%). 'Triggers' would work best when due consideration was given to the rate of use, not just an absolute number or even a percentage. For example, it is likely that initial demand will be high, but could drop off. Any 'trigger' needs to be set relative to the rate at which exhaustion is occurring when benchmarks are reached. (e.g. Although 50% might be an appropriate trigger, the time horizon for implementation of the next SAC would obviously be influenced by the rate of exhaust experienced at the time the trigger was reached.)

Page 21, Item 31

Much of the general information related to the SIS/800 database should be available from the government under the Freedom of Information Act. And that general information should also be provided in a usable format (e.g. electronic) that would allow manipulation for analysis. There is no valid reason for the specific toll free end user information suggested on page 23 detailing who is doing what, and how much of it. That is an undue and unwanted invasion of privacy by the government (or the RESPORGS if they had it) and would set a new and dangerous precedent for invading the privacy associated with business operations, trade secrets, and confidentiality.

Page 23, Item 33

Limit the numbers allowed to be in reserve status. If the end user pays the \$.70 per number (and more) passed along by the carrier, how can the end user be a 'hoarder'. In other words, the larger the reserve pool, the greater propensity to hoarding. The requirement to 'pass through' **reserve status** to **installed status** during the recent 800 'alert' did nothing but delay availability of toll free numbers. Installations should allow 'streamlining' processes that bypass the reserve status. If ANY entity wants to hoard, reserve seems the cheapest way. If you impose higher fees to reserve numbers, allow sincere users to bypass 'reserve' with streamlined installation provisions.

Page 27, Item 41

Referring to exercising a right of first refusal as 'free' is absurd. End users have already paid for the installation of their '800' number, and would also pay to install the complementary '888' number, and so on. Let's not get too carried away with this craze to charge for everything. The fee for installing the number should be sufficient. There is absolutely no evidence to suggest that the holders of vanity numbers caused the current problem. To the contrary, the problem was caused by lack of regulatory attention.

Page 29, Item 44

The idea of using a SIC as an identifying code that would act as a mechanism to accomplish any public policy is also absurd. The range of entities that use toll free numbers crosses all business lines, at a time when all sorts of businesses are in several different business at once. SICs could be manipulated or misrepresented by either end users or carrier officials. If you really want to play around with codes that accomplish something, give an end user a PIN code that would be needed to change the status of the number after it is installed. The current system allows individuals who do not hold a legitimate interest in a number to order changes which are not properly verified. To restore a misappropriated number to its valid end user currently takes a lot of correspondence and after the fact validation. A PIN code would prevent the 'reverse-slamming' that is currently going on, preventing individuals from transferring numbers without authority.

The right of first refusal after the database was closer to exhaustion makes the most sense. That plan would prevent the current vanity holder from being financially penalized by requiring a premature installation in order to accomplish those worthwhile objectives enumerated by proponents of the principle of 'first refusal'. The holders of 'vanity' numbers, and that should include any entity with any 800 number who classifies themselves as having an interest in retaining the same number under any new toll free SAC, are as far away from causing the current shortage as possible. They are the end users who built up traffic volume, established customer recognition of the number, and provided the revenues to operate the system. If regulators had not allowed the unbridled hoarding that marked the last two years, there would be no need for a new SAC and no confusion about who the toll free caller would be reaching.

I defy anyone to sit down with a number-word matching program such as 800-WORD and come up with more than 25% of all 7 digit numbers within any SAC that 'spell something'.

Admittedly, allowing anyone who so wished, to reserve the same 888 number as currently installed under SAC 800 would be antithetical to my opinions regarding 'reserve' status, and would likely result in a high number of responses in the affirmative. If a nominal charge were imposed, the affirmative responses would drop off. It would seem both equitable and enforceable to impose a nominal fee for the right to register a 'potential right of refusal' against the same number in 888 that an end user has in 800. If 25% responded in the affirmative, the remaining 75% of 888 numbers would be assigned first. When 50% of all numbers had been assigned, the 'potential right of refusal' holders would have to install the 888 number or give up their rights in the number. To those who would point out that some end users might choose to install their 'right of refusal' number with each new SAC introduced, I say, that should be their right. After all, we are only talking about numbers. And the numbers only have value if they accomplish their intended purpose. And that purpose has always been to connect the calling party to the party they intended to call.

The costs associated with storing and manipulating numbers continues to fall dramatically. The burdens associated with carrying out a SAC expansion beyond 888,887, and so on will grow lighter with each advancement in computer technology.

Sincerely,

W.E. Miller, Jr.
President

A handwritten signature in black ink, appearing to read "W.E. Miller, Jr.", written over the typed name and title.